

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, INC., A CALIFORNIA
CORPORATION,

PLAINTIFF,

VS.

GERALD ARMSTRONG, ET AL.,

DEFENDANTS.

NO. C 420 153

DEPOSITION OF GERALD DAVID ARMSTRONG

AUGUST 18, 1982

VOLUME II

Reported by GREGORY R. ADELSON, CSR NO. 1873, RPR

Gregory R. Adelson

CERTIFIED SHORTHAND REPORTERS

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1 THE CHURCH. AT THIS POINT I WILL ASK THAT YOUR ANSWER BE
2 READ BACK.

3 (RECORD READ BY REPORTER.)

4 THE WITNESS: RIGHT. SO THE QUESTION WAS, HAD HE TOLD
5 ME IF HE HAD A MEETING?

6 Q BY MR. KOHLWECK: HAD HE TOLD YOU DURING THAT
7 MEETING THE FACT THAT YOU HAD LEFT THE CHURCH HAD BEEN
8 DISCUSSED WITH HIM?

9 A I BELIEVE SO.

10 Q CAN YOU RECALL APPROXIMATELY WHEN MR. GARRISON
11 TOLD YOU THAT?

12 A NO.

13 Q WAS IT WITHIN THE LAST THREE MONTHS?

14 A I DON'T RECALL.

15 Q CAN YOU RECALL IF IT WAS PRIOR TO APRIL OF 1982?

16 A I DON'T RECALL.

17 Q HAS HE EVER MADE A STATEMENT SUCH AS, "GERRY, I
18 DON'T THINK I SHOULD GIVE THESE MATERIALS TO YOU SINCE YOU
19 ARE NO LONGER A PART OF THE CHURCH"? HAS HE STATED THAT IN
20 SUBSTANCE OR EFFECT?

21 A NO.

22 Q HAS HE EVER QUESTIONED YOU AT ANY TIME CONCERNING
23 THE PURPOSES FOR WHICH YOU WERE REQUESTING DOCUMENTS, COPIES
24 OR ORIGINALS?

25 A NO.

26 Q AS TO THE MATERIALS THAT YOU RECENTLY SENT BACK
27 TO MR. GARRISON ON MONDAY OF THIS WEEK, DID HE REQUEST THAT
28 YOU SEND THOSE MATERIALS BACK TO HIM?

1 A NO.

2 Q DID YOU PROVIDE THE DOCUMENTS TO MR. GARRISON
3 AND MR. FLYNN ON MONDAY OF THIS WEEK IN PREPARATION AND IN
4 ANTICIPATION FOR THIS DEPOSITION?

5 A NO.

6 Q DO YOU REMEMBER YOUR TESTIMONY YESTERDAY
7 CONCERNING FOUR TAPES THAT YOU HAD RECEIVED FROM BARBARA
8 DE CELLE?

9 A YES.

10 Q NOW, I BELIEVE THAT WE ESTABLISHED THROUGH
11 ONE OF YOUR AFFIDAVITS THAT AT LEAST ONE OF THOSE TAPES
12 CONTAINED VERBATIM MINUTES OF A MEETING THAT TOOK PLACE
13 SOMETIME IN THE PAST, WHICH IS THE SUBJECT MATTER OF ONE OF
14 YOUR AFFIDAVITS.

15 WHAT OTHER MATERIALS ARE CONTAINED ON THOSE
16 TAPES?

17 A THERE IS DISCUSSION OF -- PRINCIPALLY ABOUT FILM
18 NEGOTIATIONS AND HOW TO RESOLVE THE 2.1 MILLION DOLLAR
19 PAYMENT TO L. RON HUBBARD. THAT IS WHAT I RECALL.

20 Q AND THAT IS THE SUBJECT OF ONE OF YOUR AFFIDAVITS,
21 IS IT NOT?

22 A YES.

23 Q OR POSSIBLY TWO OF YOUR AFFIDAVITS CONCERNING
24 THE R.R.F.?

25 A YEAH. IT IS THE AFFIDAVIT WHICH YOU HAD HERE.

26 Q ARE YOU AWARE OF ANY OTHER MATERIALS BEING
27 CONTAINED ON THOSE TAPES?

28 A I DON'T RECALL AT THIS TIME.

1 MS. DRAGOJEVIC: GOOD. WONDERFUL.

2 Q BY MR. KOHLWECK: MR. ARMSTRONG, ON WHAT
3 OCCASIONS HAVE YOU SENT EITHER ORIGINAL OR COPIES OF DOCUMENTS
4 TO MR. MICHAEL FLYNN'S OFFICE?

5 A TO MY RECOLLECTION, SOMETIME IN MAY, SOMETIME IN
6 JUNE, SOMETIME IN JULY, AND ONCE IN AUGUST.

7 Q NOW, BY YOUR RECITATION THERE, DO YOU MEAN ONCE
8 DURING THE MONTHS OF MAY, JUNE, JULY, AND AUGUST, OR ON MORE
9 THAN ONE OCCASION DURING EACH ONE OF THOSE MONTHS?

10 A TO MY RECOLLECTION, THERE WERE FOUR TIMES WHEN I
11 SENT COPIES OR ORIGINALS OF DOCUMENTS TO MR. FLYNN. THERE
12 MAY BE FIVE. BUT IT IS IN THAT AREA.

13 Q IN TERMS OF NUMBER OF PAGES, HOW MANY PAGES OF
14 ORIGINAL DOCUMENTS HAVE YOU SENT TO MR. FLYNN?

15 A I'D ESTIMATE 3,000.

16 Q APPROXIMATELY HOW MANY PAGES OF ORIGINAL
17 DOCUMENTS DID YOU SEND TO MR. FLYNN IN APRIL?

18 A I SAID ALTOGETHER.

19 THE FIRST QUESTION WAS ALTOGETHER?

20 Q YES.

21 A AND NOW WE ARE TALKING ABOUT APRIL?

22 MS. DRAGOJEVIC: OBJECTION. HE NEVER STATED THAT HE
23 SENT ANYTHING TO MR. FLYNN IN APRIL.

24 Q BY MR. KOHLWECK: DID YOU SEND ANYTHING TO
25 MR. FLYNN IN APRIL?

26 A I DON'T BELIEVE SO.

27 Q LET'S MAKE THAT MAY, THEN.

28 APPROXIMATELY HOW MANY PAGES OF ORIGINAL

1 DOCUMENTS DID YOU SEND TO MR. FLYNN IN MAY?

2 A NONE THAT I RECALL.

3 Q SAME QUESTION, IN JUNE.

4 A PERHAPS 200 OR 300.

5 Q AND JULY?

6 A AGAIN, ABOUT THE SAME, A FEW HUNDRED.

7 Q AND AUGUST?

8 A PERHAPS 2,000.

9 Q WE'VE BEEN TALKING ABOUT ORIGINAL DOCUMENTS SO
10 FAR.

11 A THAT'S CORRECT.

12 Q THE SAME QUESTION NOW AS TO COPIES OF DOCUMENTS.
13 IN TOTAL, HOW MANY PAGES OF COPIES OF DOCUMENTS
14 HAVE YOU PROVIDED TO MR. FLYNN?

15 A IN THE NEIGHBORHOOD OF 5,000.

16 Q HOW MANY IN MAY, APPROXIMATELY?

17 A 4,000.

18 Q AND HOW MANY IN JUNE?

19 A A COUPLE HUNDRED.

20 Q AND HOW MANY IN JULY?

21 A A COUPLE HUNDRED.

22 Q AND HOW MANY IN AUGUST?

23 A ABOUT THE SAME; 300, 400.

24 Q AND IS THE SOURCE OF ALL THESE COPIES, DOCUMENTS
25 THAT YOU BORROWED FROM MR. GARRISON TO COPY?

26 A YES.

27 Q NOW, SAME QUESTION AGAIN.

28 HOW MANY ORIGINAL DOCUMENTS HAVE BEEN PROVIDED TO

1 THE LAW OFFICES OF BUNCH & CONTOS?

2 MS. DRAGOJEVIC: CONTOS & BUNCH.

3 MR. KOHLWECK: CONTOS & BUNCH. EXCUSE ME.

4 THE WITNESS: I WOULD SAY 2,000.

5 Q BY MR. KOHLWECK: WHEN WAS THE EARLIEST PROVIDED
6 TO THAT OFFICE?

7 A TO MY RECOLLECTION, IT WAS SOMETIME IN JULY.

8 Q AND HOW MANY DOCUMENTS, ORIGINAL DOCUMENTS, WERE
9 PROVIDED DURING THE MONTH OF JULY TO THAT OFFICE?

10 A THAT IS WHAT I JUST SAID, A COUPLE THOUSAND.

11 Q AND HOW MANY IN AUGUST?

12 A I BELIEVE NONE.

13 Q SAME QUESTION AS TO COPIES OF DOCUMENTS.
14 WHEN IS THE FIRST TIME COPIES OF DOCUMENTS WERE
15 PROVIDED TO CONTOS & BUNCH?

16 A IN JULY.

17 Q AND HOW MANY COPIES, APPROXIMATELY, WERE PROVIDED
18 IN JULY?

19 A MY RECOLLECTION, APPROXIMATELY 400.

20 Q IN AUGUST?

21 A I BELIEVE 20.

22 Q AND AS TO THESE DOCUMENTS THAT WE IDENTIFIED
23 THIS MORNING, YOU IDENTIFIED SEVERAL DIFFERENT CATEGORIES OF
24 DOCUMENTS THAT YOU HAD ORIGINALS OF.

25 A YES.

26 Q ALL OF THOSE CATEGORIES HAVE BEEN DISTRIBUTED
27 EITHER TO THE OFFICES OF CONTOS & BUNCH OR THE LAW OFFICES
28 OF MICHAEL FLYNN; IS THAT CORRECT?